



**Office of the
Special Narcotics Prosecutor
for the City of New York**

Bridget G. Brennan, Special Narcotics Prosecutor

80 CENTRE STREET, SIXTH FLOOR
NEW YORK, NY 10013
212-815-0400, GEN.
212-815-0440, FAX

March 17, 2021

BY ELECTRONIC DISCOVERY

Dear Counsel:

This disclosure letter concerns Detective Paul Dawkins Shield #6674 of the New York City Police Department (“the Department”), presently assigned to Narcotics Borough Brooklyn North (“NBBN”), whom the People intend to call as a witness in this case. In addition to the information below, police disciplinary information exists in various formats online, including in a database located at: <https://www.nyclu.org/en/campaigns/Nypd-misconduct-database>. Information concerning Detective Dawkins may or may not be included in this database, and the People are unable to verify the database’s general accuracy.

On or about July 27, 2016, the Department opened an internal investigation into alleged misconduct by Detective Dawkins. The Department later substantiated allegations against Detective Dawkins for Memobook Incomplete Improper.

On or about February 18, 2020, the Department opened an internal investigation into alleged misconduct by Detective Dawkins. The Department later substantiated allegations against Detective Dawkins for Fail to Prepare Report - Stop Question Frisk Report. The Department penalized Detective Dawkins with a Verbal Instruction.

The Civilian Complaint Review Board is investigating the following allegations made against Detective Dawkins from an incident occurring on August 30, 2019: (1) Discourtesy – Word; (2) Force – Physical Force; (3) Abuse – Threat of Arrest; (4) Abuse – Threat of Force (Verbal or Physical); and (5) Abuse – Refusal to Provide Shield Number. These allegations are pending, and the CCRB has informed the People that the CCRB is unable to provide any factual determinations for pending allegations.

Pursuant to People v. Garrett, 23 N.Y.3d 878 (2014), the People are disclosing the following list of civil lawsuits in which Detective Dawkins has been named in his capacity as a member of law enforcement.

The People identified the lawsuits listed below primarily using public databases and information, including a list of lawsuits alleging misconduct by the NYPD and its individual officers which is published every six months on the New York City Law Department’s web site, available at <https://www1.nyc.gov/site/law/public-resources/nyc-administrative-code-7-114.page>. Publicly-available litigation materials related to these lawsuits are also being provided, to the extent the materials currently are in the People’s possession.

Case Name: *GILL, KEVIN, ET AL. VS DAWKINS, PAUL, ET AL.*

Case Number: 16CV01398; Court: U.S. District Court - Eastern District NY; Litigation Start Date: April 15, 2016

Case Name: *WISDOM, KHALID VS CITY OF NEW YORK, ET AL.*

Case Number: 17CV02443; Court: U.S. District Court - Eastern District NY; Litigation Start Date: May 04, 2017

Case Name: *YUNUS, EQUAN, JR. VS DAWKINS, PAUL, ET AL.*

Case Number: 16CV04465; Court: U.S. District Court - Eastern District NY; Litigation Start Date: October 19, 2016

Allegations of misconduct that have not been substantiated and are not pending (including, but not limited to, findings of unsubstantiated, unfounded, and exonerated) are not subject to disclosure and generally are not included in this letter. Additionally, the decision to include information in this letter does not represent a conclusion by the People that all the information contained herein is required to be disclosed under the People's constitutional, ethical or statutory obligations. The People reserve the right to move in limine to preclude or limit reference to the information in this letter in any further proceedings in this prosecution.

If you have any questions, feel free to contact me at (212) 815-0414.

Sincerely,

Lauren Di Giovanni

Assistant District Attorney